

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY
Albert Russo CN 4853 Trenton, New Jersey 08650 (609) 587-6888 STANDING CHAPTER 13 TRUSTEE
In Re: MICHAEL S. KLAPKIN SUSAN KLAPKIN Debtors

Case No: 18-22055 CMG

Chapter 13

Hearing Date: 2/20/19 @ 10:00 AM

Judge: Christine M. Gravelle

STANDING CHAPTER 13 TRUSTEE'S OBJECTION TO DEBTOR(S) MODIFIED PLAN

The Standing Chapter 13 Trustee, Albert Russo, objects to the Debtors' Modified Plan for the following reasons:

1. The modified plan filed to surrender residence. Amended I & J were filed. Debtor's social security income and tax refund was removed. Projected rental payment of \$2,600 was added. Debtor was to move out of residence by 12/31/18 per the certification. Trustee requires a copy of new rental lease agreement to support rent paid of \$2,600 per month and updated proof of income.
2. State of New Jersey filed a late priority, secured, and unsecured claims. The priority claim is unsecured and the unsecured claim is partially estimated.

WHEREFORE, the Standing Chapter 13 Trustee objects to Debtors' Modified Plan.

DATED: 2/15/19

By: /s/ Albert Russo
Albert Russo, Standing Chapter 13 Trustee
By: Mary A. Krieger, Staff Attorney